

REMARKS

Claims 1-42 are pending in the Application. Claims 1-42 are rejected under 35 U.S.C. §103(a). Applicants have cancelled claims 1-42 and added new claims 43-54. Hence, claims 43-54 are pending. Applicants reserve the right to file a continuation application to capture the subject matter of originally filed claims 1-42. In view of the newly submitted claims, much of the Examiner's rejections are now moot. Nonetheless, Applicants offer the following observations which are still germane to the art cited by the Examiner vis-à-vis the newly submitted claims.

Applicants thank the Examiner for discussing the Office Action with Applicants' attorney on April 12, 2004.

I. REJECTIONS UNDER 35 U.S.C. § 103(a):

The Examiner has rejected claims 1-42 under 35 U.S.C. § 103(a) as being unpatentable over "Planning and Deploying a Single Sign-On Solution" by Netscape Communications Corporation (hereinafter "Netscape") in view of Chu et al. (U.S. Patent No. 6,016,508) (hereinafter "Chu"). Applicants respectfully traverse these rejections for at least the reasons stated below, and respectfully request the Examiner to reconsider and withdraw these rejections.

A. The Examiner has not presented any objective evidence for combining Netscape with Chu.

A *prima facie* showing of obviousness requires the Examiner to establish, *inter alia*, that the prior art references teach or suggest, either alone or in combination, all of the limitations of the claimed invention, and the Examiner must provide a motivation or suggestion to combine or modify the prior art reference to make the claimed inventions. M.P.E.P. §2142. The showings must be clear and particular and supported by objective evidence. *In re Lee*, 277 F.3d 1338, 1343, 61 U.S.P.Q.2d 1430, 1433-34 (Fed. Cir. 2002); *In re Kotzab*, 217 F.3d 1365, 1370, 55 U.S.P.Q.2d 1313, 1317 (Fed. Cir. 2000); *In re Dembiczak*, 50 U.S.P.Q.2d. 1614, 1617 (Fed. Cir. 1999). Broad conclusory

statements regarding the teaching of multiple references, standing alone, are not evidence. *Id.*

The Examiner's motivation for modifying Netscape with Chu is "since the directory entries already exist within the LDAP directory." Paper No. 6, pages 3-4. This motivation is insufficient to support a *prima facie* case of obviousness since it is merely the Examiner's subjective opinion.

The Examiner must provide objective evidence as to why one of ordinary skill in the art with the primary reference (Netscape) in front of him, which teaches performing the capability of a single sign-on (see page 1), would be modified with a secondary reference (Chu), which teaches server-determined client refresh periods for dynamic directory services (see Abstract). *In re Lee*, 61 U.S.P.Q.2d 1430, 1434 (Fed. Cir. 2002); *In re Kotzab*, 55 U.S.P.Q.2d 1313, 1318 (Fed. Cir. 2000). The motivation provided by the Examiner ("since the directory entries already exist within the LDAP directory") is not a motivation as to why one of ordinary skill in the art with a primary reference (Netscape) in front of him, would have been motivated to modify the teachings of the primary reference (Netscape) with the teachings of the secondary reference (Chu). Merely stating "since the directory entries already exist within the LDAP directory" does not address as to why one of ordinary skill in the art with the primary reference (Netscape) in front of him would specifically modify the primary reference (Netscape) with the secondary reference (Chu). Consequently, the Examiner's motivation is insufficient to support a *prima facie* case of obviousness for rejecting claims 43-54. *In re Lee*, 61 U.S.P.Q.2d 1430, 1434 (Fed. Cir. 2002).

Furthermore, there is no suggestion in Netscape of performing server-determined client refresh periods (as taught in Chu). Neither is there any suggestion in Netscape of performing server-determined client refresh periods for dynamic directory services (as taught in Chu). Since the Examiner has not submitted objective evidence for modifying Netscape with Chu, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 43-54. *In re Lee*, 61 U.S.P.Q.2d 1430, 1434 (Fed. Cir. 2002).

As a result of the foregoing, Applicants respectfully assert that the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 43-54. M.P.E.P. §2143.

B. By combining Netscape with Chu, the principle of operation of Netscape would change.

If the proposed modification or combination of the prior art would change the principle of the operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. *In re Ratti*, 270 F.2d 810, 123 U.S.P.Q. 349 (C.C.P.A. 1959). Further, if the proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon*, 733 F.2d 900, 221 U.S.P.Q. 1125 (Fed. Cir. 1984). For the reasons discussed below, Applicants submit that by combining Netscape with Chu, the principle of operation in Netscape would change and subsequently render the operation of Netscape to perform its purpose unsatisfactory.

As stated above, Netscape teaches providing the capability of a single sign-on. Page 4. Single sign-on refers to allowing a user to log in once, using a single password, and getting authenticated access to all servers that the user is authorized to use. Page 4.

Chu, on the other hand, teaches client 56 and client 57 logging onto server 55 to initiate an online session with server 55. Column 6, lines 48-49. Chu further teaches that the initiation of an online session is accomplished by a client sending the message to the server requesting that the client be permitted to log onto the server. Column 6, lines 51-53. Chu further teaches that both clients 56 and 57 are sending a message to server 55 to request that they be permitted to log onto server 55. Column 6, lines 54-56. Hence, Chu teaches that each user is required to use a separate password to authenticate themselves to each server they need to access. That is, Chu does not teach the capability of a single sign-on.

By combining Netscape with Chu, Netscape would no longer be able to allow a user to log in once using a single password and get authenticated access to all the servers the user is authorized to use. As stated above, Chu does not provide the capability of a single sign-on. Instead, Chu requires users to provide separate passwords to authenticate themselves to each server they need to access. Hence, by combining Netscape with Chu, Netscape would no longer be able to provide the capability of a single sign-on. Hence, the principle of operation of Netscape would change and subsequently render the operation of Netscape to perform its purpose unsatisfactory by combining Netscape with Chu. Therefore, the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 43-54. *In re Ratti*, 270 F.2d, 810, 123 U.S.P.Q. 349 (C.C.P.A. 1959); *In re Gordon*, 733 F.2d 900, 221 U.S.P.Q. 1125 (Fed. Cir. 1984).

C. Netscape and Chu, taken singly or in combination, do not teach or suggest the following claim limitations.

Applicants respectfully assert that Netscape and Chu, taken singly or in combination, do not teach or suggest "mapping to a second entry in said LDAP directory associated with said user if said user is authenticated, wherein said second entry comprises a credential associated with said target application, wherein said credential enables said target application to be automatically started" as recited in claim 43 and similarly in claims 47 and 51.

Applicants further assert that Netscape and Chu, taken singly or in combination, do not teach or suggest "automatically starting said target application by providing said credential to said target application if said user is authenticated" as recited in claim 43 and similarly in claims 47 and 51.

Applicants further assert that Netscape and Chu, taken singly or in combination, do not teach or suggest "receiving a message from a client to log onto said target system to access said target application, wherein said message comprises a first user identification and a first password" as recited in claim 43 and similarly in claims 47 and 51.

Applicants further assert that Netscape and Chu, taken singly or in combination, do not teach or suggest "accessing a first entry in a Lightweight Directory Access Protocol (LDAP) directory associated with said client to authenticate said user of said client, wherein said first entry comprises a second user identification and a second password" as recited in claim 43 and similarly in claims 47 and 51.

Claims 44-46, 48-50 and 52-54 recite combinations of features including the above combinations, and thus are patentable for at least the above reasons as well. Claims 44-46, 48-50 and 52-54 recite additional features, which, in combination with the features of the claims upon which to depend are patentable over Netscape in view of Chu.

For example, Netscape and Chu, taken singly or in combination, do not teach or suggest "wherein said credential is associated with a group of resources" as recited in claim 44 and similarly in claims 48 and 52.

Applicants further assert that Netscape and Chu, taken singly or in combination, do not teach or suggest "wherein said credential enables access to a group of target applications" as recited in claim 45 and similarly in claims 49 and 53.

Applicants further assert that Netscape and Chu, taken singly or in combination, do not teach or suggest "wherein said LDAP directory comprises a plurality of entries, wherein one of said plurality of entries comprises an identification and a password associated with a unique user, wherein one of said plurality of entries comprises a credential associated with one or more target applications said unique user is authorized to access" as recited in claim 46 and similarly in claims 50 and 54.

As a result of the foregoing, Applicants respectfully assert that there are numerous claim limitations not taught or suggested in the cited prior art, and that the Examiner has not presented a *prima facie* case of obviousness for rejecting claims 43-54 as being unpatentable over Netscape in view of Chu. M.P.E.P. § 2143.

II. CONCLUSION

As a result of the foregoing, it is asserted by Applicants that claims 43-54 in the Application are in condition for allowance, and Applicants respectfully request an allowance of such claims. Applicants respectfully request that the Examiner call Applicants' attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining issues.

Respectfully submitted,

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